

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

PETER D. KINDER,)	
MISSOURI LIEUTENANT GOVERNOR,)	
)	
DALE MORRIS,)	
)	
SAMANTHA HILL,)	
)	
JULIE KEATHLEY,)	
individually and as parent and guardian for)	
M.K., her minor son.)	
)	
Plaintiffs,)	
)	
v.)	Case No: 1:10-cv-00101-RWS
)	
)	
TIMOTHY F. GEITHNER,)	
SECRETARY OF TREASURY,)	
)	
KATHLEEN SEBELIUS,)	
SECRETARY OF HHS,)	
)	
ERIC H. HOLDER, JR.,)	
ATTORNEY GENERAL)	
)	
HILDA L. SOLIS,)	
SECRETARY OF LABOR,)	
)	
Defendants.)	

**PLAINTIFFS' CONSENT MOTION FOR
AN EXTENSION OF TIME AND MEMORANDUM IN SUPPORT**

Plaintiffs Missouri Lieutenant Governor Peter Kinder, Samantha Hill, Dale Morris, and Julie Keathley (“Plaintiffs”), pursuant to Local Rule 6-1.05, and for their Consent Motion for an Extension of Time and Memorandum in Support, state the following:

1. Plaintiffs filed their Complaint on July 7, 2010. (Docket No. 1).

2. On July 9, 2010, the Missouri Attorney General Chris Koster filed a Motion to Intervene and Memorandum in Support. (Docket Nos. 4 and 5).

3. Pursuant to this Court's July 19, 2010 Order, Plaintiffs' response to Attorney General Koster's Motion to Intervene is currently due on July 23, 2010. (Docket No. 10).

4. Local Rule 6-1.05 provides that this Court may, for good cause shown, "extend or shorten any time limit imposed" by the Eastern District of Missouri's local rules.

5. Plaintiffs' counsel and counsel for Attorney General Koster are currently reviewing and discussing those issues raised in Attorney General Koster's Motion to Intervene and Memorandum in Support. The parties are hopeful these issues can be resolved without the need for further litigation of this issue.

6. Pursuant to Local Rule 6-1.05, Plaintiffs are seeking a twenty-one (21) day extension to file their response to Attorney General Koster's Motion to Intervene.

7. Attorney General Koster has consented to Plaintiffs seeking this extension.

7. Accordingly, Plaintiffs are seeking an additional twenty-one days (to and including August 13, 2010) within which to file a response to Attorney General Koster's Motion to Intervene.

8. The Defendants have not yet entered their appearances in this case and will not suffer any prejudice by reason of this twenty-one day extension of time.

8. This proposed extension will not delay this case, but may actually speed resolution by avoiding unnecessary litigation.

WHEREFORE, Plaintiffs respectfully request this Court grant its request for a twenty-one-day extension of time for filing its response to Missouri Attorney General Chris Koster's Motion to Intervene, making Plaintiffs' response due on August 13, 2010.

Dated: July 23, 2010

Respectfully submitted,

ARENT FOX, LLP

/s/ Mark F. (“Thor”) Hearne, II _____

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